

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** :  
:  
v. : **01-5 Erie**  
:  
**CHARMAINE LEANICE SIMS** :

**MOTION TO WITHDRAW**

**AND NOW**, comes the Petitioner, CHARBEL G. LATOUF, ESQUIRE, counsel for the above-captioned defendant, and files the following Motion to Withdraw, and in support thereof, states the following:

1. The defendant was initially indicted on February 13, 2001 for one count of Possession With Intent to Distribute Cocaine.
2. The Petitioner was retained to represent the defendant through the plea process and sentencing.
3. On or about July 9, 2008 the United States Probation Department filed a Petition revoking her probationary status.
4. A hearing is currently scheduled before the Honorable Sean McLaughlin on or about August 6, 2008 at 2:30 pm.
5. The defendant, Charmaine Leanice Sims, needs the assistance of the Federal Public Defender's Office and has requested that undersigned counsel formally withdraw from the above-captioned case so that she can proceed with legal counsel by and through the Federal Public Defender's Office.

**WHEREFORE**, Petitioner, Charbel G. Latouf, Esquire, respectfully requests this Honorable Court grant him leave to withdraw as counsel from the above-captioned case.

Respectfully submitted,

**RIDGE and McLAUGHLIN**

BY: s/Charbel G. Latouf, Esquire

Charbel G. Latouf, Esquire  
246 West Tenth Street  
Erie, Pennsylvania 16501  
(814) 454-4555

Attorney for the Defendant

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**CHARMAINE LEANICE SIMS** :

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Motion to Withdraw was served this date via electronic filing upon the following individuals, in accordance with Rules of this Court:

United States Attorney  
17 South Park Row, Room A-330  
Erie, Pennsylvania 16501

Charmaine Leanice Sims  
1102 Marne Road  
Erie, Pennsylvania 16511

David J. Conde  
United States Probation  
17 South Park Row, Room A-110  
Erie, Pennsylvania 16501

**RIDGE & MC LAUGHLIN**

By: Charbel G. Latouf, Esquire  
Charbel G. Latouf, Esquire  
246 West Tenth Street  
Erie, PA 16501  
(814) 454-4555

Dated: July 14, 2008